



TNRCC

*Protecting Texas
by Reducing and
Preventing Pollution*

Pre-CERCLIS Screening Checklist

**E.I. DuPont De Nemours
Houston, Harris County, Texas**

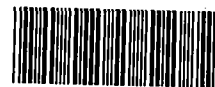
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REGION VI

**Prepared in cooperation with the
U.S. Environmental Protection Agency**

October 2000



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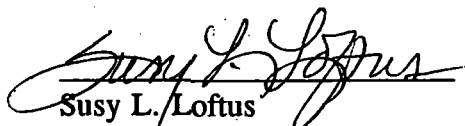
FILE3

Pre-CERCLIS SCREENING CHECKLIST

**E.I. DUPONT DE NEMOURS
HOUSTON, HARRIS COUNTY, TEXAS**

TXD000633529

SIGNATURE PAGE

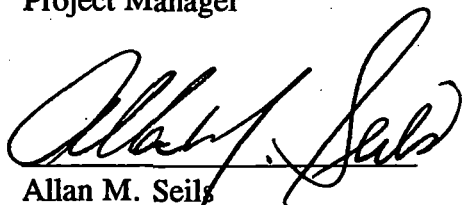


Susy L. Loftus

Texas Natural Resource Conservation Commission
Project Manager

10/3/00

Date

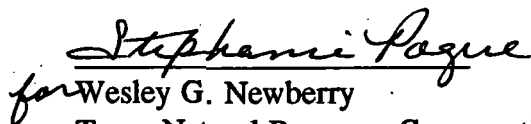


Allan M. Seils

Texas Natural Resource Conservation Commission
PA/SI Program Manager

10/3/00

Date


for Wesley G. Newberry

Texas Natural Resource Conservation Commission
PA/SI Program Technical Director

10-3-00

Date



William Rhotenberry

U.S. Environmental Protection Agency

10/5/00

Date

PRE CERCLIS FIELD SCREENING CHECKLIST

1.0 GENERAL SITE INFORMATION

SITE NAME: E. I. DuPont De Nemours			
ADDRESS: 3860 West 11 th Street (listed on CERCLIS incorrectly as 3806 West 11 th Street)			
CITY: Houston	ZIP: 77055	COUNTY: Harris	CONG. DIST: 7
PHYSICAL LOCATION (directions to site): Located in the northwestern section of Houston in an industrial area north of Interstate Highway 10 and west of the intersection of Highways 290 and 610.			
Latitude 29° 47' 22.06N		Longitude 95° 26' 44.77W	
TYPE OF OWNERSHIP <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Indian Nation <input type="checkbox"/> State <input type="checkbox"/> County Other			
SITE STATUS: <input checked="" type="checkbox"/> Active <input type="checkbox"/> Inactive <input type="checkbox"/> not specified 15 # of employees (if active)		YEARS OF OPERATION <input type="checkbox"/> Unknown <u>1976</u> to <u>present</u> Begin End	
EPA ID # TXD000633529 State SWR # 36618 & 71412 Other #			
Site Owner (if available): Board Pension Commissioner, Los Angeles, California			
Site Operator (if available): Raw Materials Corporation			
Description of site activities (e.g. manufacturing plant, abandoned refinery, etc.)			
The site consists of warehouse space with offices and loading docks currently occupied by Raw Materials Corporation. The warehouse space is used for storage of chemicals used to manufacture paint. No mixing of paint is currently done at the site.			
Comments			
The leased warehouse space with offices now occupied by Raw Materials Corporation was formerly maintained by E. I. DuPont De Nemours (DuPont) as a paint mixing and storage operation from 1976 to 1993. An environmental assessment was performed prior to DuPont moving from the facility and no problems were found (see Attachment I). A RCRA Part A application was filed for the facility as a transportation, storage and/or disposal facility and operated under interim status until 1982. Formal notice was made at that time to close the site's interim status because the site never treated, stored, or disposed of hazardous waste. The			

facility operated as a large quantity generator. The RCRA Information Management Section reported the site to CERCLIS as a RCRA Environmental Priorities Initiative (EPI) site because the site's interim status was closed without filing a Part B permit. A decision of No Further Action was recorded by the EPA in May 1996 because the Superfund program was no longer evaluating EPI sites.

2.0 SITE SCREENING INFORMATION

Date:	7/26/00	Time:	10:00 a.m.
TNRCC Personnel:	Susy Loftus and Melissa Cordell		
<p>An on and off site property reconnaissance was conducted on July 26, 2000 by Susy Loftus and Melissa Cordell of the TNRCC. The subject property is located in a commercial/industrial district in the northwest portion of Houston. The building appears to be in good shape and the warehouse interior was well-maintained and orderly. No evidence of environmental concerns was found. Containers noted in the warehouse were in good condition and labeled clearly. Labels included the names Beckosol (drums), Bermocoll (dry), calcium stearate (dry), and titanium dioxide (dry). See Attachment II for a brochure describing products stored at the location.</p>			

3.0 RANK (Seriousness of Situation)

- ☒ 1 **Low Potential Hazard** - No waste source(s) identified and/or limited or no targets
- ☐ 2 **Low to Moderate Potential Hazard** - May have a waste source(s) and/or limited or no targets identified.
- ☐ 3 **Moderate Potential Hazard** - Potential waste source(s), potential targets are present in the area but no release is suspected.
- ☐ 4 **Moderate to High Potential Hazard** - Potential waste source(s) identified, a release may be suspected and potential targets are present in the area.
- ☐ 5 **High Potential Hazard** - Potential waste source(s) identified, a release is strongly suspected or observed, targets are present in the area and may be impacted. Sites in this category are believed to require immediate attention by EPA.
- ☐ 6 **Other** - Sites that for various reasons, do not fit into one of the above scoring

4.0 HAZARD DESCRIPTION (e.g. details on sources, contaminants, historical discharges, waste management and chemical use, threat to public and/or environment)

Dupont Automotive Maintenance Finishes occupied the site from 1976 until 1993. The site was used as a mixing and storage facility for automotive paints and finish products such as lacquers, solvents, and other surface coatings. The main components used in the operations consisted of resins (alkyd, acrylic, and epoxy resins), pigments, and solvents (alcohols, ketones, and aromatic and aliphatic hydrocarbons). Waste materials were stored in 55-gallon drums. Between five and 10 drums of waste were generated per month, according to a Texas Department of Water Resources Compliance Inspection Report. No spills or discharges have been reported.

DuPont Environmental Remediation Services (DERS) performed a Phase I Pre-Transaction Due Diligence Environmental Assessment in August 1993. During the assessment, Mr. Don McAvoy, site manager for DuPont, stated that no spills or releases had occurred during his seven years at the site.

DuPont was the first tenant in the building, followed by Raw Materials Corporation. According to the facility manager, Ms. Terri Cogan, no hazardous wastes are currently generated by Raw Materials Corporation. The facility is used solely as a warehouse and distribution point for chemicals used in the manufacturing of paint and related materials.

5.0 SITE FEATURES

Potential Waste Sources:

<input type="checkbox"/>	Ponds, Lagoons, Surface Impoundments	<input type="checkbox"/>	Drums
<input type="checkbox"/>	Contaminated Soil	<input type="checkbox"/>	Pits
<input type="checkbox"/>	Transformers	<input type="checkbox"/>	Landfills
<input type="checkbox"/>	Waste Piles	<input checked="" type="checkbox"/>	No Sources Identified
<input type="checkbox"/>	Storage Tanks (above & below)	<input type="checkbox"/>	Other

Describe sources and releases

(e.g. #drums, size of impoundment, leaking drums, ruptured tank, containment)

The warehouse is currently used by Raw Materials Corporation for storage of chemicals used in the paint manufacturing industry. The containers in the warehouse at the time of the site inspection were all in good condition with no evidence of any spills or leaks. Attachment II contains a list of chemicals stored at the site.

According to an environmental assessment performed in August 1993 by DERS, hazardous wastes generated at the site between 1976 and 1993 were off-specification paint and spent solvents that were accumulated and stored in 55 gallon drums. The main components used in the operations conducted by DuPont consisted of resins (alkyd, acrylic, and epoxy resins), pigments, and solvents (alcohols, ketones, and aromatic and aliphatic hydrocarbons). The waste products were disposed at the Ensco Hazardous Waste Company in El Dorado, Arkansas. No reports of releases or spills have been found.

No records of environmental violations or enforcement activities for this site were found during the records review.

6.0 TARGETS

Describe targets and proximity to wastes

(lagoon draining to creek, 10 homes within 200 feet, stressed vegetation and contamination at homes, SW intakes, nearest public and private drinking water wells, etc.)

Groundwater

- The closest water supply well (PWS #G1011180A) is approximately 0.5 mile from the site and is completed to a depth of 324 feet below ground surface in the Chicot aquifer. The owner of the well on record is: EFCO & Company, P.O. Box 7379, Houston, Texas. According to Ken May, Natural Resource Specialist, Public Drinking Water, Texas Natural Resource Conservation Commission (TNRCC), the well was reported to the TNRCC as inactivated on August 15, 1996.
- Eight other water supply wells are located within a 2-mile radius of the site with completion depths ranging from 334 to 1,665 feet below ground surface.
- The Evangeline and Chicot aquifers supply the wells. It is not known at this time how many of the wells are currently active.

Surface Water

- Surface water runoff from the site is directed to city storm sewers.
- Surface water bodies within two miles of the site include White Oak Bayou and other small tributaries to Buffalo Bayou. Both of the water bodies are designated for contact recreation.
- The site is located in the San Jacinto River Basin. No drinking water intakes are located within the 15-mile target distance limit.
- The status of sensitive environments was not determined.

Soil

- The soil pathway is not considered a pathway of concern at this time because no soil contamination is suspected and no residences, schools, daycare facilities, or hospitals are located within 500 feet of the site.

Air

- Not evaluated and not considered to be a pathway of concern.

9.0 Photographs

Photographs



**Photo 1 - 7/26/00. Photographer Melissa Cordell, TNRCC.
View of flammable materials storage room.**



**Photo 2 - 7/26/00. Photographer Melissa Cordell, TNRCC.
View of flammable materials storage room.**

Photographs, continued



Photo 3 - 7/26/00. Photographer Melissa Cordell, TNRCC.
View of materials stored inside warehouse.



Photo 4 - 7/26/00. Photographer Melissa Cordell, TNRCC.
View of stored materials inside warehouse.

Photographs, continued



Photo 5 - 7/26/00. Photographer Melissa Cordell, TNRCC. Facing northeast. View of unused loading dock at railroad spur behind warehouse.



Photo 6 - 7/26/00. Photographer Melissa Cordell, TNRCC. Facing south. View from inside warehouse of loading area at front of facility.

Photographs, continued

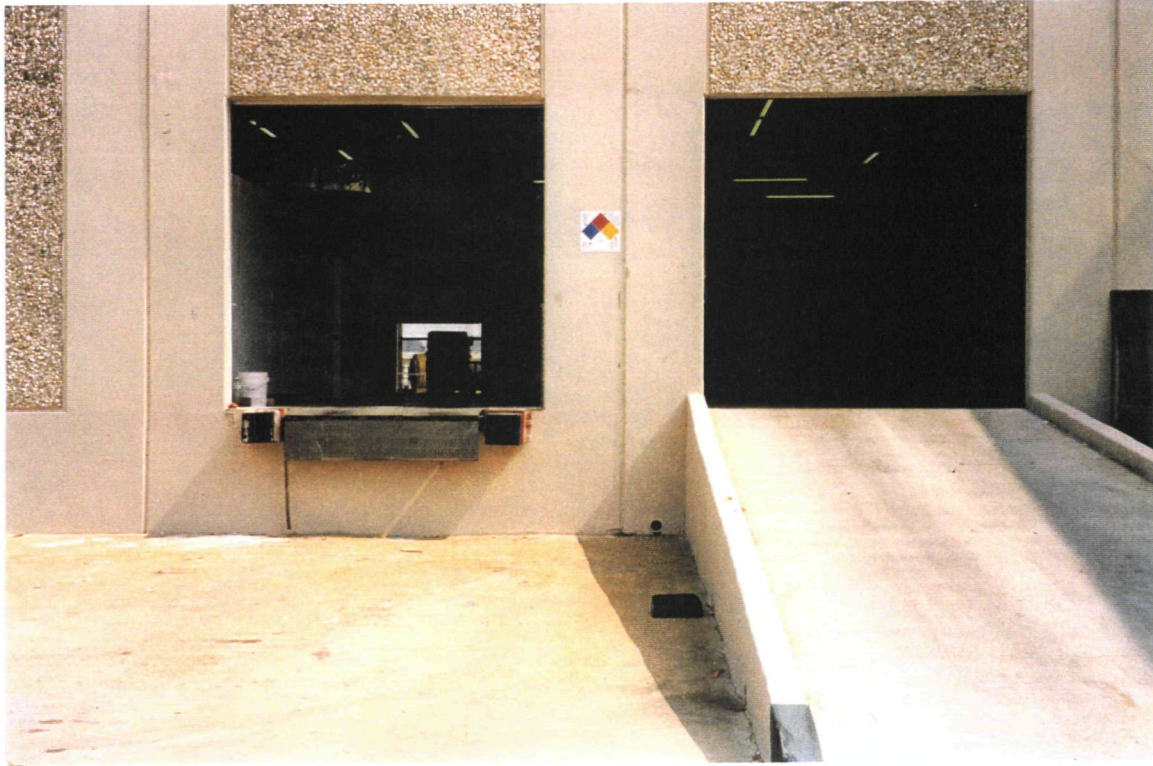


Photo 7 - 7/26/00. Photographer Melissa Cordell, TNRCC. Facing north.
View of loading docks from parking lot.



Photo 8 - 7/26/00. Photographer Melissa Cordell, TNRCC. Facing northwest.
View of loading docks from parking lot.

10.0 Conclusions

The site was is a former RCRA facility that was designated as an Environmental Priorities Initiative site in 1990 after DuPont did not renew its interim status and did not submit a Part B application. Although hazardous waste has been generated and accumulated at the site in the past, there is no known history of releases of hazardous materials at the site. Surrounding land use is industrial/commercial with numerous railroad spurs. No residences, schools, day cares, or sensitive environments have been identified within 500 feet of the site. An environmental assessment conducted in 1993 did not identify any releases or environmental concerns connected with the site. A site reconnaissance performed on July 26, 2000, did not identify any environmental hazards at the site.

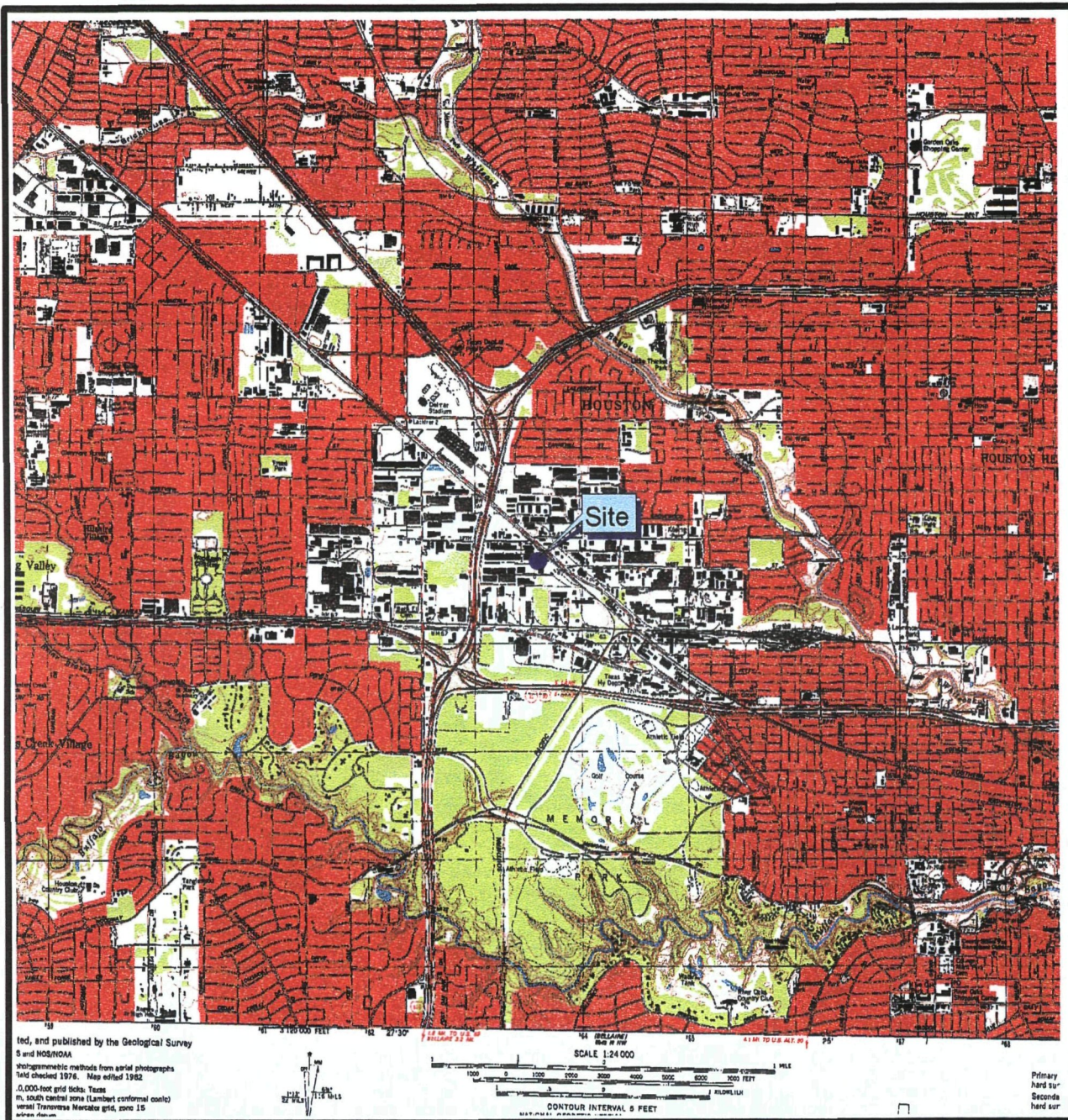


Figure 1: Site Location Map

E.I. DuPont De Nemours
3860 West 11th Street
Houston, Harris County, Texas

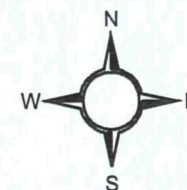
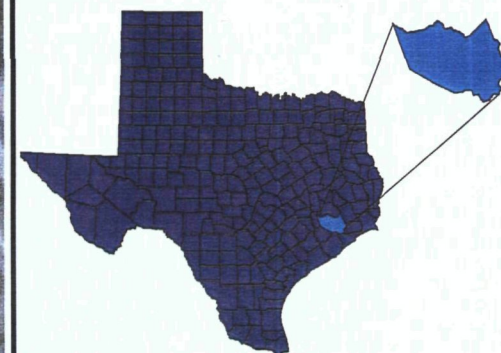


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Figure 2: Site Layout

E. I. DuPont De Nemours
3860 West 11th Street
Houston, Harris County, Texas



0.1 0 0.1 0.2 Miles



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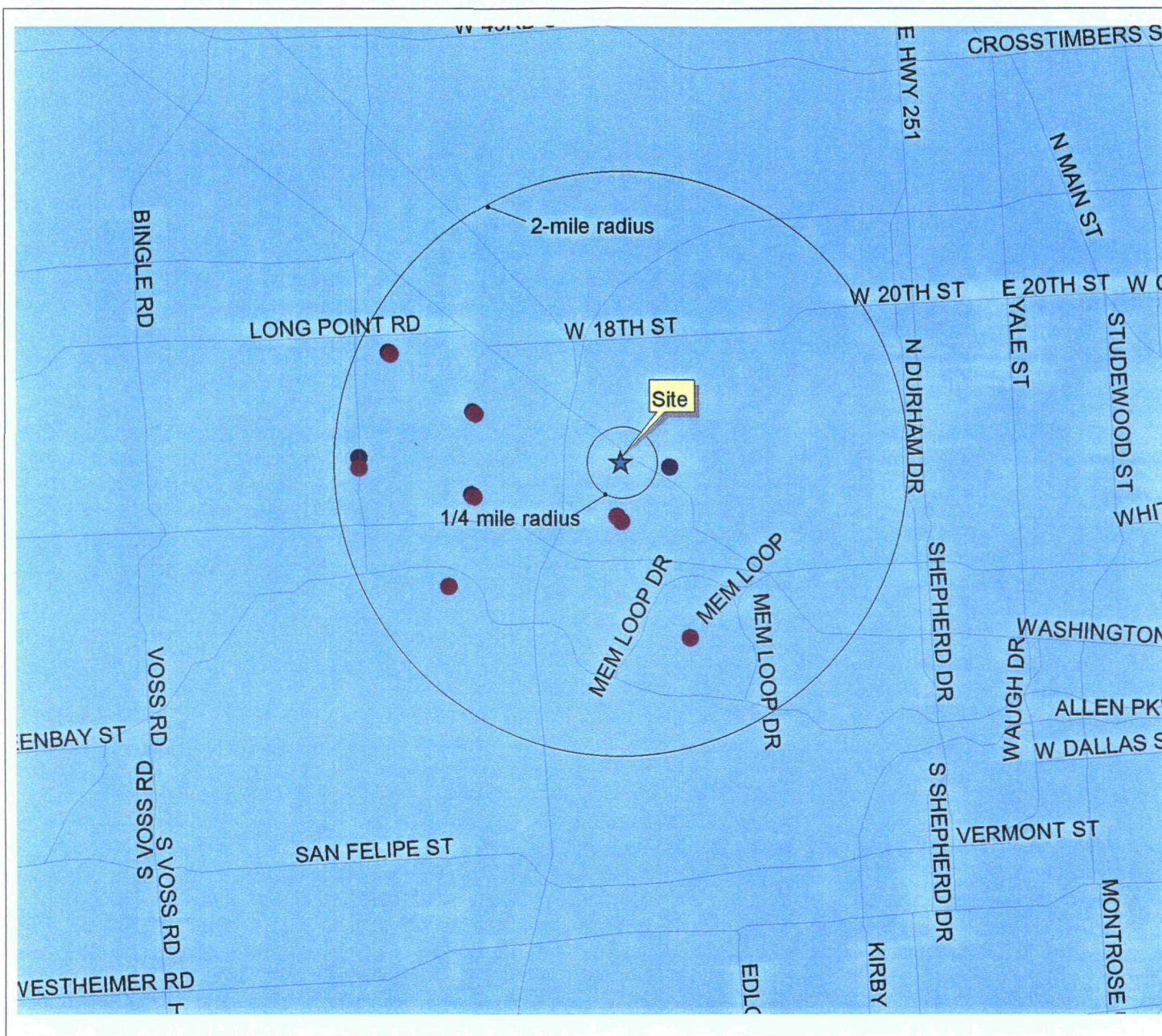
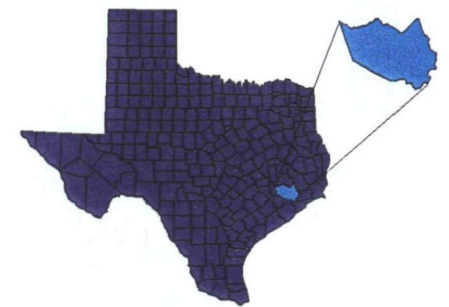


Figure 3: Water Well Locations

E. I. DuPont De Nemours
3860 West 11th Street
Houston, Harris County, Texas



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- Wells from TNRCC database
- Wells from TWDB databases

Attachment I

**PRE-TRANSACTION DUE DILIGENCE ASSESSMENT
OF THE
AUTOMOTIVE PRODUCTS WAREHOUSE PROPERTY
AT
3860 WEST ELEVENTH STREET
HOUSTON, TEXAS**

Prepared For:

**Mr. John Randall
DuPont
Automotive Products
950 Stephenson Highway
Suite 244
Troy, Michigan 48063**

Prepared By:

**DuPont Environmental Remediation Services
140 Cypress Station Drive
Suite 140
Houston, Texas 77090**

**DERS Project Number 402784-01
August 1993**

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Appendix B **Material Safety Data Sheets**

Appendix C **DuPont Pre-Inspection Questionnaire**

Appendix D **EPA Correspondence and CERCLIS Report**

Appendix E **Environmental Database Site Report**

2.0 FACILITY SETTING

The property is located in a mixed industrial area immediately inside the 610 Loop in west-central Houston (see Figure 1). The warehouse is part of a larger warehouse building that contains several other businesses. Immediately adjacent and west of the DuPont warehouse is Sonneborn Building Products, MGS Products, and ChemRex, Inc., Houston. Immediately adjacent and east of the DuPont warehouse is Barnett Brass and Copper, Inc., and LeRan Copper and Brass, Inc. To the east of Barnett and LeRan is Exide Corporation Battery Sales.

The property is bounded by a railroad spur to the north and public streets to the south and west. North of the property, across the railroad spur, is Gulf Forge Company, the most notable heavy industry in the area. Soils at the Gulf Forge site were noticeably oil-stained.

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DU PONT AUTO FINISHES
010 522 8192
August 30, 1997
DERS Project Number: 002784-01
Page 1

1.0 PURPOSE AND OBJECTIVE

At the request of Mr. John E. Randall, Jr. of DuPont Automotive Products (DuPont), DuPont Environmental Remediation Services (DERS) conducted a Phase I Pre-transaction Due Diligence Environmental Assessment of the DuPont Automotive Maintenance Finishes (High Performance Coatings) warehouse facility located at 3860 West 11th Street in Houston, Texas. The purpose of the assessment was to identify potential environmental impacts and describe current site environmental conditions.

3.0 FACILITY HISTORY

The property being assessed was built in 1973 and DuPont has leased the facility from the Trammell Crow Company since 1976. The property housed the Regional Office for the Automotive Division's Maintenance Finishes (High Performance Coatings) business. DuPont vacated the property to consolidate their business at another Houston location. Figure 2 shows the plan view of the property.

3.1 Facility Operations

DuPont used the leased space for mixing and storing automotive paints and finish products, such as paints, lacquers, solvents and associated surface-coating materials. The facility was also used to distribute these materials to customers. All materials were delivered to the facility by truck, unloaded by fork lift at the front docks, and then re-loaded for distribution to customers via truck through the same front loading docks. The railroad spur at the rear of the building was never used for delivery or shipping of products.

The warehouse complex contained several operational areas. The three sections of the warehouse were: office space, blending and "red label" room, and the main warehouse space. The office area had five offices, a lobby, a work room, kitchen and several lavatories. The blending and "red label" room were flammable liquids handling and storage areas. The blending room was used to mix paints, colorants and thinners to formulate custom paints. The "red label" area was used to store thinners and other highly flammable materials. Both rooms were equipped with explosion-proof electrical equipment. The large warehouse space was used to store the facility's stock of paints. Storage was on sprinkler-protected metal pallet racks.

The building is concrete tilt-wall construction with interior, two-hour, fire-rated concrete block walls. The floors were also constructed of concrete and the roof of corrugated metal. The steel pallet racks used to store product were not removed from the building. Photographs of the property leased by DuPont are provided in Appendix A.

3.2 Materials Handled

Major components of the materials handled at the warehouse are summarized as follows:

- Resin - A mixture of alkyd, acrylic and epoxy resins used as paint organic binders or film-formers;
- Pigments - An assortment of pigments and extenders were handled;
- Solvents - Alcohols, ketones, and aromatic and aliphatic hydrocarbons were used.

Material Safety Data Sheets (MSDS) included in Appendix B give a detailed list of product constituents.

1 1 0 0 9 0 0 1 5

August 31, 1993

BERS Project Number: 007704-01

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4.0 SPILLS AND RELEASES

In a personal interview with the site manager, Mr. W. Don Mc Avoy, he described the site procedure to record any spills or releases of chemicals to the environment. Mr. Mc Avoy said that, to his knowledge during his seven years of service at the site, no spills or releases had occurred. Further, because there are no spill or release reports on file, this is an indication that no spills or releases had occurred in the ten years prior to his arrival on site. Mr. Mc Avoy also stated that the general site housekeeping procedure required immediate cleanup of any spills that occurred to the building's concrete floor. Small paint drips in the area of the solid waste dumpster in front of the building were cleaned by sand blasting as part of site housekeeping prior to vacating the building.

Appendix B contains the DuPont Pre-Inspection Questionnaire which was completed by Mr. Mc Avoy. No spills or releases to the environment have occurred as reported by this document.

August 30, 1993

DEAS Project Number: 402784-01

Page 8:

5.0 WASTE MANAGEMENT

5.1 Historical Perspective

DuPont was not the first tenant in this building and no records exist that document the prior condition or use of the building. The location of this building is in an industrial area where there is the potential for off-site contamination from adjacent neighbors.

5.2 DaPont History

The hazardous wastes generated by the warehouse were the residues of mixed, color paints and spent solvents from mixing machinery and spill cleanups. These wastes were accumulated in a 55-gallon metal drum in an accumulation area within the blending room. Approximately nine 55-gallon drums of hazardous waste were generated over the course of an average year. The waste was accumulated near the point of generation and in the control of the operator of the process generating the waste. As soon as a drum was full it was prepared for shipment to the RCRA-permitted Basco Hazardous Waste Company facility in El Dorado, Arkansas, for off-site incineration. Each drum was shipped in DOT-approved containers and under proper manifest protocol. The waste was transported by company-owned vehicles, disposer-owned vehicles, and third party haulers.

Non-hazardous solid wastes were collected in outdoor dumpsters leased from local municipal waste management companies and transported to their respective local landfills for disposal. Some of the companies contracted for this disposal service included Browning Ferris Industries, Inc., and Waste Management, Inc.

Based on a conversation with Mr. Mc Avoy, no process wastewater was generated by the site. Wastewater from the warehouse lavatories was discharged to the City of Houston municipal sanitary sewer system. Site storm-water runoff was collected by building gutters and parking area drains for discharge to the City of Houston storm-water runoff collection system.

5.0 WASTE MANAGEMENT

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The hazardous wastes generated by the warehouse were the residues of mixed, color paints and spent solvents from mixing machinery and spill cleanups. These wastes were accumulated in a 55-gallon metal drum in an accumulation area within the blending room. Approximately nine 55-gallon drums of hazardous waste were generated over the course of an average year. The waste was accumulated near the point of generation and in the control of the operator of the process generating the waste. As soon as a drum was full it was prepared for shipment to the RCRA-permitted Ensco Hazardous Waste Company facility in El Dorado, Arkansas, for off-site incineration. Each drum was shipped in DOT-approved containers and under proper manifest protocol. The waste was transported by company-owned vehicles, disposer-owned vehicles, and third party haulers.

Non-hazardous solid wastes were collected in outdoor dumpsters leased from local municipal waste management companies and transported to their respective local landfills for disposal. Some of the companies contracted for this disposal service included Browning Ferris Industries, Inc., and Waste Management, Inc.

Based on a conversation with Mr. Mc Avoy, no process wastewater was generated by the site. Wastewater from the warehouse lavatories was discharged to the City of Houston municipal sanitary sewer system. Site storm-water runoff was collected by building gutters and parking area drains for discharge to the City of Houston storm-water runoff collection system.

6.0 ENVIRONMENTAL PERMITS

In discussions with Mat Loesel of the Resource Conservation and Recovery Act (RCRA) Information Management Section, he stated that the site had protectively filed a RCRA Part A application with the Environmental Protection Agency's (EPA) RCRA Hazardous Waste Management Division as a transportation, storage and/or disposal facility and operated under interim status until 1982 when formal notice was made to close the site's interim status. The interim status was closed because the site never treated, stored or disposed of hazardous waste, but only operated as a large quantity generator.

Because the site's interim status was closed without filing a Part B permit, the RCRA Information Management Section reported the site to the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) as a RCRA Environmental Priorities Initiative site for the purpose of performing a preliminary assessment and not based on any report of spill or release to the environment. No preliminary assessment was ever undertaken by the agency due to a low priority ranking. EPA correspondence and the CERCLIS report are included in Appendix D. An Environmental Database Site Report, included in Appendix E, shows the site as reported in the CERCLIS database.

August 30, 1997

DERS Project Number: 402164-01

Page 8

7.0 CURRENT CONDITIONS

A visual inspection of the facility was conducted by Dr. Ted Foss of DERS on June 1, 1993. The purpose of the site visit was to visually assess the current site conditions. The following observations were noted during the site visit.

The overall condition of the warehouse reflected good housekeeping practices. Small areas of paint spilled on the floor had been cleaned with a solvent. Ambient air monitoring was conducted during the visual inspection. Using a photoionization detector, low concentrations of a volatile organic compound (VOC) were detected in the vicinity of the area recently cleaned of spilled paint. No other VOCs were detected in the building.

Transformers on electrical utility poles were observed in the parking lot immediately to the east of the front entrance, on the south side of the building. The transformers appeared to be in good condition, with no obvious sign of leakage.

7.1 Blending and Red Label Rooms

The floor of the rooms were painted and clean. The floor was in sound condition; no cracks, gaps or floor drains were observed.

7.2 Warehouse Areas

The concrete floor in the general storage area appeared to also be in good condition. No cracks, gaps or floor drains were observed. A few areas were lightly stained where paint that had spilled was cleaned with solvent.

7.3 Other Areas

The office areas were clean and lavatories had no staining or other evidence of paint spillage or disposal. The front loading docks are concrete-floored areas with no storm-water drain. The only storm-water drain observed on the property was located in the parking lot, in front of the main entrance. No evidence of staining was observed around the drain. The solid waste trash storage unit had been removed and was not observed.

DuPont Environmental Research Center

DuPont Environmental Research Center

SEP 22 '97 7:27

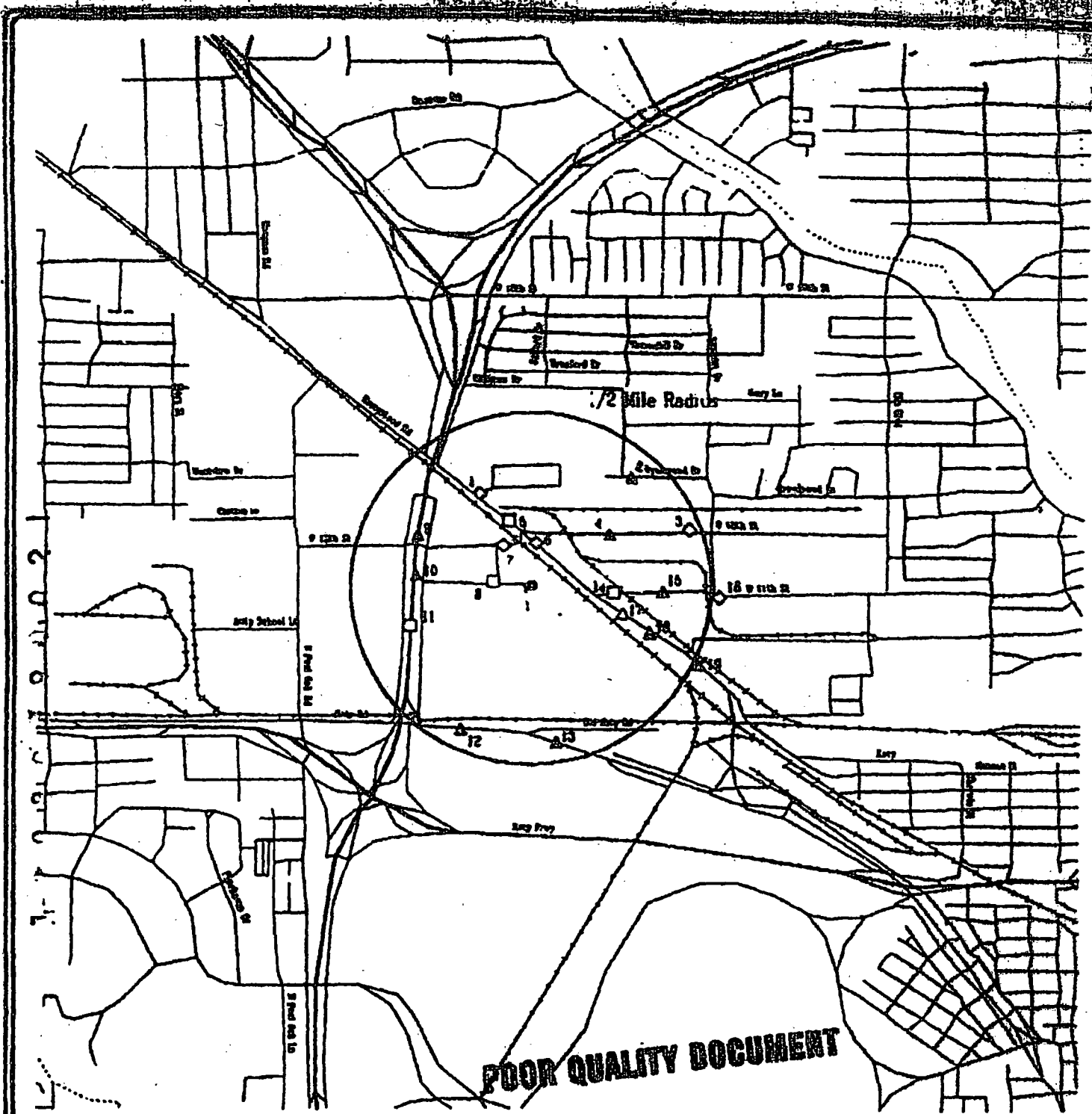
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8.0 CONCLUSIONS

The following findings were made during the due diligence assessment:

- Property conditions reflected good housekeeping practices;
- No evidence of contaminant releases was observed; and
- The quantities of waste managed at the site were small and were managed properly.

There were no indications that the activities conducted by DuPont at the site have had any adverse impact on the environment. Therefore, a second phase assessment is not recommended.



POOR QUALITY DOCUMENT

LEGEND

- SITE LOCATION
- RCRA HAZARDOUS
- ◆ RCRA VICINITY
- △ PET SITE
- ▲ LUST SITE
- CERCLA SITE
- ★ SUPERFUND SITE
- SPILL SITE
- LANDFILL SITE



SITE LOCATION MAP

**3860 W. 11TH
HOUSTON, TEXAS**



GeoSource, Inc.
ENVIRONMENTAL DATA and RESEARCH

**2201 N. LAMAR, SUITE 250
AUSTIN, TEXAS 78705
512-476-3731 FAX 512-476-3732**

FIGURE 1

810 588 6192 PAGE 81

APPENDIX C
DUPONT PRE-INSPECTION QUESTIONNAIRE

07/21/2000

PREINSPECTION QUESTIONNAIRE

This questionnaire is designed to be answered with short answers and readily available information. Attachments are encouraged. Where the requested information is not applicable, please indicate with the notation N/A.

GENERAL INFORMATION

G1. Documents

Please attach copies of the following:

- A map of the area in the vicinity of the plant
- A plant map/plot plan.
- An aerial photograph of the plant site, if available.

POOR QUALITY DOCUMENT

G2. Plant/facility name and address:

3960 W. 11TH ST
HOUSTON, TX 77055

G3. Plant manager (name/title):

W.D. McAVOY - SUPERVISOR

Environmental manager (name/title):

NA

G4. Product(s) manufactured:

NA

G5. List the primary raw materials received and stored on this site.

NA

G6. Brief history of the site (former owners, products manufactured in the past, etc):

ENVIRONMENTAL - GENERAL

E1. Environmental Setting of Plant:

- Name, population, and distance to the nearest town/city/community?
HOUSTON; TEXAS
- Name of industrial neighbors and nature of business?

- Describe any sensitive environmental areas in the immediate vicinity, of the plant. (Examples might include botanical gardens 1/4 mile from plant fence-line, major wetlands, people living at fence-line, etc).

NA

E2. Litigation Status

- Is the plant involved in any active litigation under environmental regulations or statutes?
- If plant operations are subject to any consent orders executed under environmental statutes, please summarize.

NA

POOR QUALITY DOCUMENT

H5. If hazardous wastes are transported off-site for recycle, treatment, or disposal, please provide the following information for each type of operation.

Waste Description	Vendor Service	Annual Tonnage	Vendor Name
Ex: Plate Sludge (F0006)	Landfill	1,000 tons/yr	Chem Waste Mgmt Emmelle, AL
Waste TCE	Recycle	10,000 tons/yr	XYZ Solvents

PAINT MIXED - BURNED
COLORS

-- X

ENSCO HAZARDOUS WASTE C
ELDORADO, AR

H6. How are wastes transported to off-site vendors? (Check applicable spaces.)

- ☒ Company-owned vehicles
- ☒ Disposer-owner vehicles
- ☒ Third party haulers
- ☐ Other (Describe)

H7. If any agency has conducted a formal RCRA inspection of plant operations, which items remain open or unresolved?

NA

POOR QUALITY DOCUMENT

POOR QUALITY DOCUMENT

GROUND WATER

GW1. What are the uses of ground water in the site vicinity?

NA

GW2. If you have formally assessed the potential for ground water contamination at the plant site, briefly describe your conclusions.

NA

GW3. Do you have a permit to operate an injection well to dispose of nonhazardous waste? Who is the permitting authority (EPA, state, local)? Are there facilities to treat, store, and dispose of these wastes associated with the injection well?

NA

GW4. If ground water quality is being actively monitored at the plant site, what has that program shown to date?

NA

GW5. If ground water contamination is being investigated, check the description that most accurately describes the program:

- NA
- ☐ A self-driven voluntary program
 - ☐ A state-agency-driven program
 - ☐ An EPA-driven program
 - ☐ (specify program authority, eg, Part 265.93)
 - ☐ Other
 - ☐ No program

GW6. If a ground water remediation program is being conducted, check the most appropriate description: NA

- ☐ A self-driven voluntary program
- ☐ A state-agency-driven program
- ☐ An EPA-driven program
- ☐ (specify program authority, eg, Part 264.100)
- ☐ Other
- ☐ No program

NONHAZARDOUS WASTE

NH1. If industrial or solid wastes (exclusive of trash or simple refuse) are generated at the site that are not classified as hazardous wastes, please describe and give amounts.

NA

How have you determined that such wastes are nonhazardous?

NH2. How are these wastes managed on-site?

NA

NH3. If nonhazardous wastes are shipped off-site for vendor handling or disposal, which wastes, and what is the method of handling or disposal?

NA

NH4. What is the permitting status of the nonhazardous waste management facilities on the plant site?

NA

NH5. Were any of these wastes handled in a substantially different way in the near past?

NA

NH6. Would any of the nonhazardous waste management facilities be subject to scrutiny under the continuing releases provisions of RCRA? Please describe.

NA

POOR QUALITY DOCUMENT

POOR QUALITY DOCUMENT

WATER POLLUTION CONTROL

W1. Documents

Please attach copies of the following:

- A block flow diagram of the plant's wastewater treatment facilities.
- A copy of the plant's NPDES (or state equivalent) permit and the application for such permit.
- A copy of any other wastewater treatment or disposal permits (eg, spray irrigation, UIC, evaporation ponds, etc).
- If wastewaters are discharged to a municipal wastewater system, a copy of the municipal discharge permit (if any). Also, please include a copy of the city sewer regulations.

W2. What is the name of the receiving water into which the plant discharges wastewaters? If the principal discharge is to a municipal system, where does the municipality discharge?

W3. What are the major pollutants in the plant discharges? Please give type and amounts.

W4. Who is the primary permitting authority for the discharges?

- ☐ U.S. EPA
- ☐ State
- ☐ Regional Authority
- ☐ Municipality

W5. Which plant manufacturing operations are required, fully or in part, to meet Final Effluent Guidelines issued under the Clean Water Act?

W6. Have there been any new processes added to the plant, or significant modifications of existing processes since the discharge permit request was filed?

NA

If so, has the plant informed permitting officials of these changes?

NA

1 1 0 9 0 7 9 0 2 9
POOR QUALITY DOCUMENT

POOR QUALITY DOCUMENT
AIR POLLUTION CONTROL

A1. Documents

Please attach copies of the following:

- An emission inventory for all regulated pollutants for the most recent year.

NA

- A listing of all air emission permits held by the plant showing the following: permit ID, date issued, source ID, and major contaminant emission and rate.

NA

- Any Delayed Compliance Orders, consent decrees or similar documents that delay compliance dates or modify regulatory requirements.

NA

- Table of Contents from Emergency Release Contingency Plan.

NA

A2. If any pollutants are manufactured, stored, or used which require compliance with Section 112 (Hazardous Air Pollutants) of the Clean Air Act, please list those pollutants.

NA

A3. What is the attainment status for criteria pollutants in the local air quality region?

NA

A4. What is the status of the state toxic air pollutant regulations?

NA

A5. Which sources require visible emissions control?

NA

A6. Does the plant engage in surface coating, degreasing, or other operations that have explicit coverage in state regulations?

NA

A7. Has the site received any citations, Notice of Violation (NOV), or fines for air emission exceedance or emergency release?

NA

A8. Do you have any sources of air emissions currently not permitted, or are exempted by virtue of insignificant (de minimis) quantity, etc?

EXEMPTED BY VIRTUE OF INSIGNIFICANT QUANTITY

POOR QUALITY DOCUMENT

CERCLA
Comprehensive Environmental Response,
Compensation and Liability Act (Superfund)

C1. Documents

Please attach a copy of your most recent SARA Title III submission.

C2. During the past 12 months, have you reported any release of a hazardous substance to the National Response Center? If so, what was the nature of the report(s)?

NO

C3. If the releases were investigated by the EPA, Coast Guard, or other governmental agency, what was their determination?

NA

C4. If the plant has been identified as a potentially responsible party at a "Superfund" site or state equivalent, indicate the sites.

NA

C5. Is the plant listed on the National Priority List (NPL) or has it been proposed for inclusion on the NPL?

NO

C6. If you filed an Eckhard Survey in 1978-79, please supply a copy.

C7. If you filed a 103(c) notice under CERCLA, please supply a copy.

NA

POOR QUALITY DOCUMENT

TOXIC SUBSTANCES CONTROL ACT (TSCA)

T1. Do you have any PCBs in use at the site (any substances that contain 50 ppm or greater of PCBs because of dilution)? Please identify the sources and quantities.

NO

T2. Have you disposed of PCBs? Please furnish a copy of the report prepared for last calendar year for PCBs handled at the site.

NA

T3. Are all products, intermediates, and raw materials listed on the TSCA inventory? Please provide an explanation for any that are not.

YES

T4. Have you provided EPA with any premanufacturing notification for new chemical substances manufactured or imported for this site? If so, provide nonconfidential information on the notice.

NA

T5. Are any chemicals being manufactured at the site under a section 5(e) Consent Order? If so, provide information.

NO

POOR QUALITY DOCUMENT

**DRINKING WATER -
SAFE DRINKING WATER ACT OF 1974 (SDWA)**

DW1. If the site operates a water supply system subject to regulation under the SDWA, list any violations reported to EPA or state agency during the last 12 months.

NA

POOR QUALITY DOCUMENT

1 0 0 9 0 9 0 0 3 5

APPENDIX D
EPA CORRESPONDENCE AND CERCLIS REPORT

POOR QUALITY DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

AUG 9 1993

Mr. John F. Greiner, P.G.
Project Manager
Regional Operations - Houston
Du Pont Environmental Remediation Services
140 Cypress Station Drive, Suite 140
Houston, Texas 77090

Dear Mr. Greiner:

This letter is in response to your July 19, 1993, Freedom of Information request, which we have numbered (6)RIN-2116-93, for Superfund File information on E. I. Du Pont de Nemours (TKD000633529).

Enclosed are file copies of the requested information. Your request has also been directed to the Resource Conservation and Recovery Act (RCRA) program in the Hazardous Waste Management Division for review and response to your inquiry.

If you have further questions, please call Mr. Ed Sierra, Chief, Site Assessment Section, at (214) 656-6740.

Sincerely yours,

D. Walters for

Verne McFarland, Chief
Superfund Information Management Section (6H-MC)

Enclosure

POOR QUALITY DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE SUITE 1200
DALLAS TEXAS 75202-2733

POOR QUALITY DOCUMENT

DATE: June 18, 1990

SUBJECT: FIT Task Request

FROM: William H. Taylor (6H-MA)

TO: Ed Sierra (6E-SH)

☒ New Assignment

☐ Amendment

Please task the FIT to complete the following work:

Key EPA Contact:

Name: Bartolome J. Canellas Phone: 655-6740

Desired Report Format:

☒ Formal Report ☐ Standard Report ☐ Other (Specify):
☐ Letter Report ☐ Formal Briefing

SSID Number: 1922 CERID Number: TXD000633529

EPA Site Name: E I Dupont Da Menouche

City/County/State: Houston/Harris/Texas

Type of Activity:

☐ PA ☒ RCRA-PA ☐ HRS Support ☐ Enforc. Support ☐ Training
☐ SI ☐ RCRA-SI ☐ QA Support ☐ Program Manag. ☐ Gen. Tech.
☐ LSI ☐ Reasses. ☐ Spec. Stud. ☐ Equip. Main. ☐ Assist.

FIT/SCAP Goal: Will Deliverable Meet a Unit of the Goal? ☒ Yes ☐ No

Priority: High ☐ Medium ☐ Low ☒

General Task Description: Perform Preliminary Assessment for Environmental Priorities Initiative (EPI) site.

Specific Elements: * Prepare PA using current guidance.

Collect information on attached EPI outline to the extent possible while staying within the normal average manhour expenditure for a PA (120 hours). Some of the information identified would be obtained in the course of conducting a PA anyway.

Information on identifying solid waste management units (SWMUs) is also attached.

Identify the net worth and most recent annual sales figure for the company that owns the facility.

Additional Scope Attached

Currency: Bill Taylor, Chief

Heather Schaefer
Heather Schaefer

SUPERFUND
FILE

NOV 9 1990



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SUPERFUND SITE STRATEGY R-COMMENDATION - REGION 06

Name: E J Dupont De Nemours CERCLIS ID#: TXD 000-633-529

Site Names: _____

Address: 3806 W. 11th St

County or Parish/State/Zip Code: Houston, Harris County, Texas 77056

Report Type, Date, and Author: EPA Superfund file review

COMMENDATION

☐ 1. No Further Remedial Action Planned
under Superfund (NFRAP)

☐ 2. Further Investigation Needed Under Superfund

☐ PA ☐ IIS Priority: ☐ High
☐ SSI ☐ RA ☐ Low
☐ ESI ☐ RI/FS

☐ Other: _____

To be performed by: see note below

☒ 3. Action Deferred to:

☒ RCRA ☐ NRC

JUSTIFY AUTHORITY:

☐ Removal ☒ RCRA ☐ TSCA ☐ CAA ☐ SMCRA
☐ Remedial ☐ State ☐ NPDES ☐ MRC ☐ Resource Trustee:
☐ CERCLA Enforcement ☐ Federal Facility ☐ UIC ☐ SPCC ☐ Other:
SEND SSSR COPIES TO: ☒ BSP-AC ☐ 6W-QSP ☐ ATSDR ☒ State Agency ☐ Other

DISCUSSION:

☒ This site is a former RCRA facility that was designated as an Environmental Priorities Initiative (EPI) site in 1990. The Superfund program is no longer evaluating EPI sites. this type of site is subject of corrective action under RCRA and will not meet CERCLA eligibility for Preliminary Assessment (PA evaluation at this time (Sept 1991 PA guidance). The site will be deferred to RCRA.

☒ A decision of No Further Action will be entered in CERCLIS.

APPROVALS:

Report Reviewed by: Bartoloma J. Canellas
NPL Coordinator (BSP-RA)

Signature: Bart Canellas

Date: May 1991

Recommendation Recommended by: Stacey Bennett

Signature: Stacey Bennett

Date: 05/06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SUPERFUND SITE STRATEGY RECOMMENDATION - REGION 06

Site Name: E I DuPont De Nemours CERCLIS ID#: TXD 000-633-529

Alias Site Names: _____

Address: 3806 W. 11th St

City/County or Parish/State/Zip Code: Houston, Harris County, Texas, 77055

Report Type, Date, and Author: EPA Superfund file review

RECOMMENDATION

☒ 1. No Further Remedial Action Planned
under Superfund (NFRAP)

☐ 2. Further Investigation Needed Under Superfund

☐ PA ☐ HRS Priority: ☐ High
☐ SSI ☐ RA ☐ Low

☐ ESI ☐ RI/FS

☐ Other: _____

To be performed by: see note below

☒ 3. Action Deferred to:

☐ (X) RCRA ☐ NRC

NOTIFY AUTHORITY:

☐ Removal

☒ RCRA

☐ TSCA

☐ CAA

☐ SMCRA

☐ Remedial

☐ State

☐ NPDES

☐ NRC

☐ Resource Trustee: _____

☐ CERCLA Enforcement ☐ Federal Facility

☐ UIC

☐ SPCC

☐ Other: _____

SEND SSSR COPIES TO: ☒ 6SF-AC

☐ 6W-QSP

☐ ATSDR

☒ State Agency

☐ Other

DISCUSSION:

☒ 2

This site is a former RCRA facility that was designated as an Environmental Priorities Initiative (EPI) site in 1990. The Superfund program is no longer evaluating EPI sites, this type of site is subject of corrective action under RCRA and will not meet CERCLA eligibility for Preliminary Assessment (PA) evaluation at this time (Sept 1991 PA guidance). The site will be deferred to RCRA.

☒ X

A decision of No Further Action will be entered in CERCLIS.

APPROVALS:

Report Reviewed by: Bartolome J. Cafallas
(NPL Coordinator 6SF-RA)

Signature: Paul Canella

Date: Apr/15/96

Disposition Recommended by: Stacey Bennett
(Team Leader 6SF-RA)

Signature: Stacey Bennett

Date: 04/16/96

Attachment II



Raw Materials Corporation

Representing...

Admark
Fumed silica

AKZO/Nobel
EHEC thickening systems for waterborne coating, grouts and building products. Mineral fibers..

American Fillers & Abrasives
Industrial fillers, fibers, fiber composition. Cellulose, PVC/PVA, polyethylene. Colored fibers and mica. Custom compounding.

Arizona Oxides
Natural iron oxides and synthetic/natural blends.

Burgess Pigments
Calcined kaolin clay. Water washed mica.

Cognis Corporation
(formerly Henkel)
Antisettling, dispersing, thixotropic, wetting, antiflood and antifoam agents; defoamers, mildewcides; polyamide ink resins; UV and EB curing agents; acrylic polyols; polyether/polyester polyols.

Cytec
Amino resins

Eagle Picher Minerals
Natural, calcined and flux calcined diatomaceous earth; perlite. Floor-dry®

Elementis Specialties
(formerly Rheox and Daniels)
Bentonite and hectorite organo clay rheological additives and modifiers; anti-corrosive pigments; color dispersions; micronized waxes.

Franklin Industrial Minerals
Texas calcium carbonate

Huntsman Tioxide
Titanium Dioxide pigment

Inoue USA
Processing and manufacturing equipment

K.T. Pumice
Blasting media, amorphous alumina silicates

Mayzo, Inc.
Antioxidants, UV absorbers, light stabilizers, optical brighteners

Milwhite, Inc.
Fine grind Barytes, Attapulgite Clays, Talcs

Nitroil Performance
Polyether amines; additives for polyurethane industries

Norac
Precipitated and fusion processed metallic stearates

Phoenix Containers, Inc.
Two through six gallon steel pails

Peer Chemical
Organic pigments, Azos, Naphthols, Diarylides, Phthalos, oranges and violets

Raybo Chemical
Performance coating additives

Reichhold
Solvent and waterborne resin systems: acrylic, alkyd, epoxy and epoxy curing agents, high solids, water reducible, latex, polyurethanes, lecithin, linseed and soya oils, powder coatings resins.

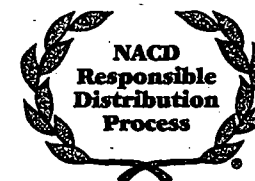
Sphere Services, Inc.
Ceramic microspheres

Tego Chemie Service USA
Radiation cure additives, high temperature silicone resins, hydrophobing agents.

Tryline Company
Hydrocarbon resins

Sino American Pigment
Organic and inorganic pigment extender

Union Miniere/Sogem
Low lead zinc dust and zinc oxide (American Process)



Quality • Responsibility • Stewardship

Attachment III

7-26-00

Susy Loftus
Melissa Cordell

Contacts:

Terri Cogan
Raw Materials Corp.
713/861-2800
3806 W. 11th St.

1994 - Raw Mat'l's
took entire DuPont Space
Chemicals for paint indus.
no mixing on site

TransWestern Properties

Drums:

Beckosol flammable 55 gallons
dry all Gone pest product
dry Bermocell - dry

12th 2 photos facing SE in -
room where flammable liquid is.

photo

3 NW direction
4 WSW

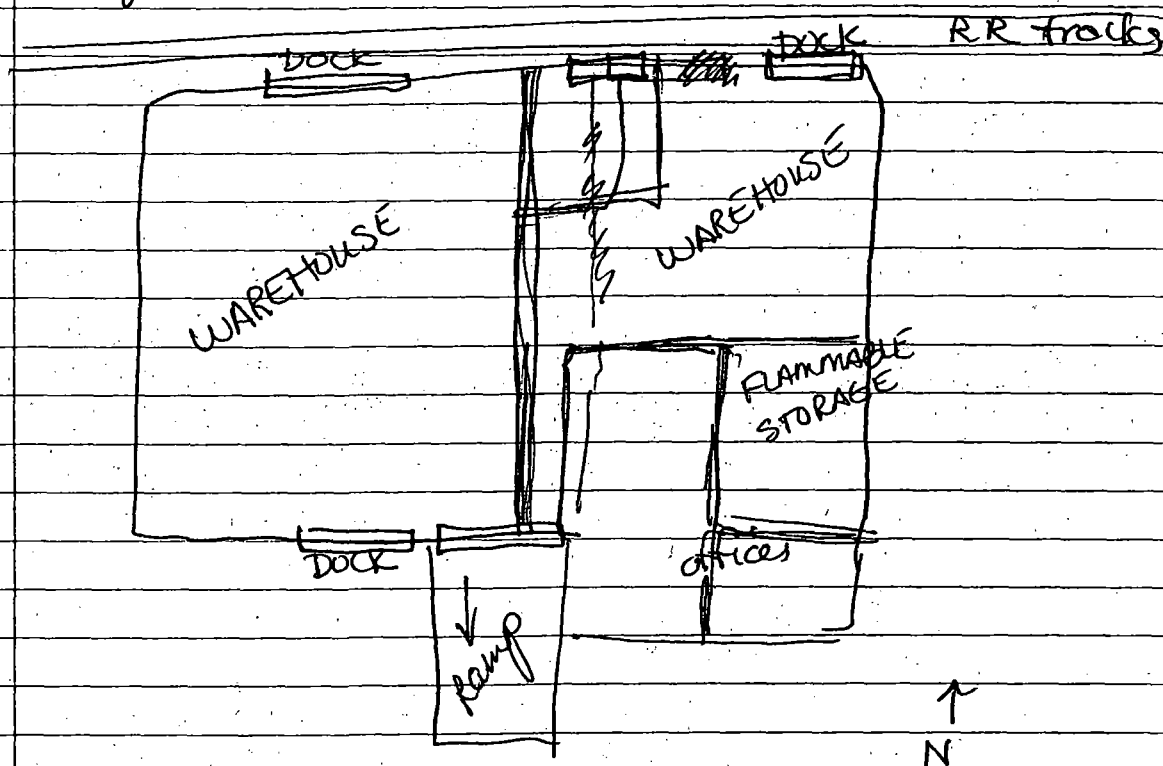
dry calcium stearate

Concrete floors in warehouse
no signs of spills

Loftus
7/26/00
ms
e/00

According to Mrs. Cogan, an
EPA Assessment" was done
when property was sold to
TransWestern — took cores, etc.

photo^s showing RR tracks — facing N
photo 6 — facing S
dry titanium dioxide
hydrated alum, silicate



photos 7 & 8 — from parking lot

5/26/00
1/26/00

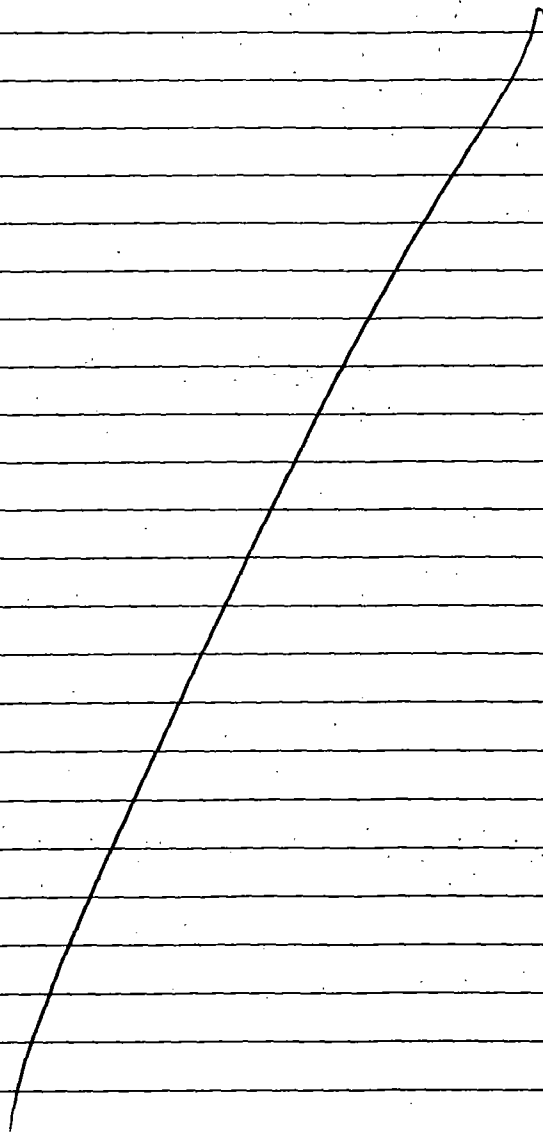
GPS reading in front parking lot. 5

29° 47' 22.06" N → 29.78946111
95° 26' 44.77" W } 107 readings

11:00 am

→ 95.445769444

Left site approx. 1130.



5/26/00